

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

WILLIAM R. HAAS,)	
)	
Plaintiff/Counter-Defendant)	
v.)	
)	Civil Action No. 1:10 CV
FALMOUTH FINANCIAL, LLC,)	565 TSE/IDD
)	
Defendant/Counter-Plaintiff)	
_____)	
)	
HSC REAL ESTATE HOLDINGS, LLC,)	
)	
Counterclaim-Plaintiff,)	
v.)	
)	
WILLIAM R. HAAS)	
)	
and)	
)	
LINDA HAAS,)	
)	
Counterclaim-Defendants.)	

**HSC REAL ESTATE HOLDINGS, LLC’S MOTION TO STRIKE PORTIONS OF
DECLARATION SUBMITTED BY WILLIAM R. HAAS**

Counterclaim-Plaintiff, HSC Real Estate Holdings, LLC (“HSC”), by and through counsel, pursuant to Rule 56(c)(2), Federal Rules of Civil Procedure, and moves for an Order striking portions of Declaration submitted by William R. Haas.

As set forth in the accompanying memorandum, the Court should strike Exhibit 1 and as well as the statements referenced in the Brief in Support of HSC’s Motion to Strike as the exhibit and statements cannot be presented in admissible form at trial.

WHEREFORE, the Defendant/Counterclaim-Plaintiff, HSC, respectfully requests that the

Court enter an Order striking Exhibit 1 of the Declaration of William R. Haas as well as the referenced statements contained in the Brief in Support of HSC's Motion to Strike and for any such further relief that the Court deems appropriate.

Respectfully submitted,

HSC Real Estate Holdings, LLC
By Counsel

/s/ Christopher T. Whelan

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of December, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and that a true and accurate copy of the foregoing was sent via electronic mail to:

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/s/ Christopher T. Whelan